

EXHIBIT 16

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION
CHASOM BROWN,
Plaintiff, Case No.
vs.
4:20-cv-03664-YGR-SVK
GOOGLE LLC,
Defendant.

CONFIDENTIAL
VOLUME II
CONTINUED ZOOM VIDEOTAPED DEPOSITION OF
JONATHAN HOCHMAN
July 21, 2022
10:09 a.m.

TAKEN BY:
JOSEF ANSORGE, ESQ.
ATTORNEY FOR DEFENDANT

REPORTED BY:
BELLE VIVIANNE, RPR, CRR, NJ-CRR,
WA/CO/NM-CCR
NATIONALLY CERTIFIED REALTIME
COURT REPORTER
VERITEXT LEGAL SOLUTIONS
JOB NO. 5312353
866.299.5127

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1 A P P E A R A N C E S
2 FOR THE PLAINTIFF:

3 MARK MAO
BOIES SCHILLER FLEXNER LLP
4 44 Montgomery Street, 41st Floor
San Francisco, California 94104
5 415.293.6800
mmao@bsfllp.com

6 RYAN MCGEE
7 MORGAN & MORGAN
201 North Franklin Street
8 7th Floor
Tampa, Florida 33602
9 813.223.0931
rmcgee@forthepeople.com

10 ALEXANDER FRAWLEY
11 IAN CROSBY
SUSMAN GODFREY
12 1301 Avenue of the Americas
32nd Floor
13 New York, New York 10019
Afrawley@susmangodfrey.com

14 COUNSEL FOR PLAINTIFF IN CALHOUN MATTER:

15 ADAM PROM
DICELLO LEVITT & GUTZLER
16 10 North Dearborn Street, Sixth Floor
Chicago, Illinois 60602
17 312.214.7900
aprom@dicellolevitt.com

18 COUNSEL FOR DEFENDANT:

19 JOSEF ANSORGE
20 JOHN WILSON, IV
QUINN EMANUEL URQUHART & SULLIVAN LLP
21 51 Madison Avenue
New York, New York 10010
22 josefansorge@quinnemanuel.com
23 CARL SPILLY
QUINN EMANUEL URQUHART & SULLIVAN, LLP
24 1300 I Street, NW, Suite 900
Washington, D.C. 20005
25 202.538.8277
carlspilly@quinnemanuel.com

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1 APPEARANCES: (Continued)

2 CRYSTAL NIX-HINES

QUINN EMANUEL URQUHART & SULLIVAN LLP

3 865 South Figueroa Street, 10th Floor

Los Angeles, California 90017

4 crystalnixhines@quinnemanuel.com

5 VIDEOGRAPHER:

6 Sean Grant

7 ALSO PRESENT:

Konstantinos Psounis, Ph.D.

8 Julie Burns

John Wilson, IV - Quinn Emanuel

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1 the data, they would have technologically 12:27:22
2 been able to do this. 12:27:25

3 Now, again, I'm not addressing 12:27:27
4 legal issues. I'm not addressing legal 12:27:29
5 restrictions or permissions. That's not 12:27:32
6 within the scope of my report. 12:27:35

7 Q. Mr. Hochman, in reaching the 12:27:42
8 conclusions that you're proffering in this 12:27:45
9 case, did you do any studies to see how 12:27:47
10 often devices are shared? 12:27:50

11 A. I have some general awareness of 12:27:55
12 the ratio between devices and users, and 12:27:58
13 I'm aware that there are something like 12:28:00
14 2.1 devices for every user. So it's 12:28:03
15 actually the case that devices share 12:28:06
16 users, not users share devices. So the 12:28:13
17 average user has more than one device on 12:28:16
18 average. 12:28:20

19 Q. Mr. Hochman, would you agree 12:28:24
20 that using fingerprinting to identify 12:28:25
21 individual users when they are in private 12:28:29
22 browsing mode and not logged in to an 12:28:34
23 account would violate their privacy? 12:28:37

24 MR. MAO: Objection to the form 12:28:41
25 of the question. 12:28:42

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CERTIFICATION

I, BELLE VIVIENNE, a Nationally
Certified Realtime Reporter, do hereby
certify:

That the witness whose testimony as
herein set forth, was duly sworn by me;
and that the within transcript is a true
record of the testimony given by said
witness.

I further certify that I am not
related to any of the parties to this
action by blood or marriage, and that I am
in no way interested in the outcome of
this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 26th day of July 2022.



BELLE VIVIENNE, CRR, CCR, RPR

* * *

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